

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

19 CV 0168

Write the full name of each plaintiff.

Mohammad Ariff Saidin
-against-

(Include case number if one has been assigned)

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

NYPD Officer Sam
Negron and City of
New York

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

First Amendment's guarantee against religious discrimination. Fourteenth Amendment prohibits enforcement of the law based on a discriminatory purpose. Equal Protection Clause by imposing its surveillance on animus against Muslim identity.

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of _____
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Mohammad A Saidin
First Name Middle Initial Last Name

639 Rosedale Avenue, Apt. 1B
Street Address

Bronx, New York 10473
County, City State Zip Code

347-918-1705
Telephone Number

Mohammad Ariff Saidin @
Email Address (if available) hotmail.com

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

<u>Sam</u>		<u>Negron</u>	
First Name		Last Name	
<u>NYPD Officer</u>			
Current Job Title (or other identifying information)			
<u>Corporation Counsel, 100 Church Street,</u>			
Current Work Address (or other address where defendant may be served)			
<u>New York</u>	<u>NY</u>	<u>10007</u>	
County, City	State	Zip Code	

Defendant 2:

<u>City of New York</u>			
First Name		Last Name	
<u>New York City Police Department</u>			
Current Job Title (or other identifying information)			
<u>Corporation Counsel, 100 Church Street,</u>			
Current Work Address (or other address where defendant may be served)			
<u>New York</u>	<u>NY</u>	<u>10007</u>	
County, City	State	Zip Code	

Defendant 3:

<u></u>		<u></u>	
First Name		Last Name	
<u></u>			
Current Job Title (or other identifying information)			
<u></u>			
Current Work Address (or other address where defendant may be served)			
<u></u>	<u></u>	<u></u>	
County, City	State	Zip Code	

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

The Supreme Court of the United States.

Date(s) of occurrence:

January 8, 2018

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Please see attached sheet.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

My court case against NYPD Sam Negrón and the City of New York has exacerbated my mental health issues like depression, paranoia, schizophrenia, panic attacks, and other medical problems as treated by the Metropolitan Hospital Center.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I want the court to order rehearing for a writ of certiorari in 16-9293 Mohammad Saidin v. Sam Negrón, et al (City of New York) and any money damages that the court deems fit and proper with a jury trial.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

January 7, 2019
 Dated

Mohammad Ariff Saidin
 Plaintiff's Signature

Mohammad A Saidin
 First Name Middle Initial Last Name

639 Rosedale Avenue, Apt. 1B
 Street Address

Bronx New York 10473
 County, City State Zip Code

347-918-1705
 Telephone Number

MohammadAriffSaidin@hotmail.com
 Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

On January 8, 2018 as a result of error or mistake by the Corporation Counsel of the City of New York in bad faith for failing to confess that the NYPD Muslim Surveillance Program as a policy of the City of New York is unconstitutional, my petition for rehearing for a writ of certiorari in 16-9293 MOHAMMAD SAIDIN V. SAM NEGRON, ET AL (CITY OF NEW YORK) was denied, even though the petition for a writ of certiorari in 17-270 WHITE, JIMMIE E. V. UNITED STATES was granted in light of the confession of error in good faith by the Solicitor General in his brief for the United States filed on November 30, 2017. Moreover, the petition for a writ of certiorari in 17-263 SANDERS, AMY V. JONES, LAMAR was granted despite no conflict of decisions between any two courts of appeals in violation of Rule 10 from 2017 Rules of the Supreme Court. Therefore, it is unfair that my petition for rehearing for a writ of certiorari in 16-9293 MOHAMMAD SAIDIN V. SAM NEGRON, ET AL (CITY OF NEW YORK) was denied despite a conflict of decisions between in 2016-979 & 2017-57 MOHAMMAD SAIDIN V. SAM NEGRON, ET AL (CITY OF NEW YORK) by the State of New York Court of Appeals and in 14-1688 (SYED FARHAJ) HASSAN V. CITY OF NEW YORK by the United States Court of Appeals for the Third Circuit when the former disagreed with the latter that the NYPD Muslim Surveillance Program as a policy of the City of New York is unconstitutional in violation of Rule 10 from 2017 Rules of the Supreme Court. I strongly believe that my case is similarly situated with the latter. So, I am seeking ten million dollars in damages due to the exacerbation of my mental health issues.

Pro Se Complainant,

Mohammad Ariff Saidin